REMARKS

Upon entry of the present amendment, claims 76-93 will remain pending in the present application. Claims 1-75 were previously cancelled. Applicants respectfully submit that no new matter is added in the above amendments.

Claims 79-81 and 88-90 stand rejected under 35 U.S.C. § 103(a) as being allegedly directed to non-statutory subject matter. Claims 76-93 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over United States Patent No. 6,988,095 ("Srinivasan") in view of United States Patent No. 5,317,727 ("Tsuchida"). Applicants respectfully traverse the rejections.

Interview Summary

Applicants' undersigned representative, Mr. Eiferman, and Examiner Fleurantin participated in a telephonic interview on March 19, 2007 to discuss the 35 U.S.C. § 103(a) rejections and the remarks below. Examiner Fleurantin agreed to reevaluate the rejection in light of the remarks below.

Rejections under 35 U.S.C. § 101

Claims 79-81 and 88-90 stand rejected under 35 U.S.C. § 103(a) as being allegedly directed to non-statutory subject matter. Independent claims 79 and 88 are hereby amended to recite a computer readable storage medium, which is a tangible object. Thus, Applicants respectfully submit that independent claims 79 and 88 are directed to statutory subject matter. Applicants further submit that claims 80, 81, 89 and 90 are patentable at least by reason of their dependency. Accordingly, reconsideration and withdrawal of the 35 U.S.C. § 101 rejections are respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 76-93 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over United States Patent No. 6,988,095 ("Srinivasan") in view of United States Patent No. 5,317,727 ("Tsuchida"). Applicants respectfully traverse the rejections.

Claims 76-84

Independent claims 76, 79 and 82 are directed to pre-fetching data for a particular attribute from all objects in an object set. For example, if an application submits a query requesting Attribute B of Object 4 (See Fig. 3), then data for Attribute B will be identified and retrieved from all objects in object set 310 (including Objects 3, 4, 5, and N). However, only Attribute B for Object 4 will be returned to the application. Attribute B for Objects 3, 5, and N will be placed in a cache for future use.

To reduce the time required to process the query, a "structure context description" that identifies each object in the set of objects is generated ***prior to*** receiving the query. Thus, when the query is received, the database can quickly and easily identify the related objects and pre-fetch the requested attribute from the related objects by simply referencing the pre-generated structure context description.

The Office Action alleges that "creating a structure context description that identifies each object in the set of ***objects.***" reads on Srinivasan (Col. 10, ll. 40-56), which discloses the translation of an object query into a ***relational*** query. However, Applicants note that translating an object query to a relational query, in fact, teaches away from the creating the structure context description because the structure context description identifies ***objects*** (rather than ***relational*** data). Moreover, even assuming, *arguendo,* that Srinivasan (Col. 10, ll. 40-56) teaches creating a structure context description, Srinivasan still fails to teach or suggest "***prior to receiving a query***, creating a structure context description . . ." This is because translating the object query to a relational query as disclosed in Srinivasan (Col. 10, ll. 40-56) cannot possibly be performed until ***after*** the object query has been received. By contrast, the claims require creating a structure context description ***prior to*** receiving the query. Tsuchida similarly fails to teach or suggest a structure context description.

Thus, the cited references do not teach or suggest "prior to receiving a query, creating a structure context description that identifies each object in the set of objects, whereby the structure context description reduces time required to process the query after the query is received," as recited in independent claims 76, 79 and 82. Accordingly, Applicants respectfully submit that independent claims 76, 79 and 82 are patentable over the cited

references. Applicants further submit that claims 77, 78, 80, 81, 83 and 84 are patentable at least by reason of their dependency.

Claims 85-93

Independent claims 85, 88 and 91 are directed to pre-fetching data for ***all*** non-requested attributes in an object. For example, if an application submits a query requesting Attribute B of Object 4 (See Fig. 3), then data for ***all*** Attributes (including Attributes A, B, C, D and E) of Object 4 will be identified and retrieved. However, only Attribute B for Object 4 will be returned to the application. Attributes A, C, D and E will be placed in a cache for future use.

To reduce the time required to process the query, a "structure context description" that identifies each attribute in the object is generated ***prior to*** receiving the query. Thus, when the query is received, the database can quickly and easily identify each attribute in the object by simply referencing the pre-generated structure context description.

The Office Action alleges that "creating a structure context description that identifies each attribute in the ***object.***" reads on Srinivasan (Col. 10, ll. 40-56), which discloses the translation of an object query into a ***relational*** query. However, Applicants note that translating an object query to a relational query, in fact, teaches away from the creating the structure context description because the structure context description identifies attributes in an ***object*** (rather than ***relational*** data). Moreover, even assuming, *arguendo,* that Srinivasan (Col. 10, ll. 40-56) teaches creating a structure context description, Srinivasan still fails to teach or suggest "***prior to receiving a query***, creating a structure context description . . ." This is because translating the object query to a relational query as disclosed in Srinivasan (Col. 10, ll. 40-56) cannot possibly be performed until ***after*** the object query has been received. By contrast, the claims require creating a structure context description ***prior to*** receiving the query. Tsuchida similarly fails to teach or suggest a structure context description.

Thus, the cited references do not teach or suggest "prior to receiving a query, creating a structure context description that identifies each attribute in the object, whereby the structure context description reduces time required to process the query after the query is received," as recited in independent claims 85, 88 and 91. Additionally, the cited references

do not teach or suggest "retrieving the data corresponding to all other attributes of the object," as recited in independent claims 85, 88 and 91. Accordingly, Applicants respectfully submit that independent claims 85, 88 and 91 are patentable over the cited references. Applicants further submit that claims 86, 87, 89, 90, 92 and 93 are patentable at least by reason of their dependency. Accordingly, reconsideration and withdrawal of the 35 U.S.C. § 103(a) rejections are respectfully requested.

CONCLUSION

In view of the above amendments and remarks, Applicants respectfully submit that the present application is in condition for allowance. In view of the above remarks, Applicants respectfully request reconsideration of the present application.

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/Kenneth R. Eiferman/
Kenneth R. Eiferman
Registration No. 51,647

Woodcock Washburn LLP
Cira Centre
2929 Arch Street, 12th Floor
Philadelphia, PA 19104-2891
Telephone: (215) 568-3100
Facsimile: (215) 568-3439